

# EXHIBIT 2

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ANIBAL RODRIGUEZ, et al.,  
Plaintiffs,

v.

Case No.

GOOGLE LLC,

20-cv-04688-RS

Defendant.

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HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY  
ZOOM VIDEOTAPED DEPOSITION OF DAVID MONSEES

Thursday, September 15, 2022

9:00 a.m. PST

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TAKEN BY:

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Anthony Gulino

1 Q. Oh, okay. Great. 07:42:15  
2 Let me try a different document. 07:42:18  
3 Give me a second here. 07:42:24  
4 (Exhibit P-44, Article entitled 07:42:26  
5 Obfuscating GAIA ID in WAA-off Logs, 07:42:26  
6 marked for identification.) 07:42:26  
7 BY MR. MAO: 07:42:26

8 Q. Let me introduce Exhibit 44. 07:42:57  
9 When you have it, please take a look. 07:42:58  
10 A. Okay. All right. This is a 07:43:33  
11 fairly lengthy document. Is there a -- 07:43:33  
12 and -- and its font is very small on my 07:43:37  
13 screen. Is there a -- a particular area I 07:43:39  
14 should focus in that I can determine if 07:43:42  
15 there's other aspects to review? 07:43:43  
16 Q. Yeah. I -- I -- I -- my 07:43:46  
17 questions on this are actually fairly 07:43:47  
18 discrete, which is that, like if you look 07:43:53  
19 at 271 -- well, first of all, it sounds 07:43:55  
20 like you are familiar with this document, 07:43:58  
21 right? 07:43:59  
22 A. Yes, I am familiar with this. I 07:43:59  
23 believe I was a contributor this document. 07:44:02  
24 Q. Got it. That -- that's -- 07:44:04  
25 that's helpful to know. 07:44:05

1	Do you see the background	07:44:06
2	section there?	07:44:08
3	A. Yes, I do. Give me a minute to	07:44:10
4	review.	07:44:13
5	Q. Yeah. Please.	07:44:13
6	A. Okay. Thank you. I've had a	07:44:42
7	chance to read that section.	07:44:44
8	Q. Yeah. You see at the very	07:44:49
9	bottom there, it says "Note: There are	07:44:51
10	multiple efforts blocked by the WAA-off	07:44:56
11	logging changes (Assistant for work GA	07:44:59
12	launch, Home/work launch in Maps,	07:45:02
13	Assistant feature launches)." How did --	07:45:05
14	do you know how this logging change	07:45:13
15	affected GA?	07:45:16
16	A. I -- I believe GA in this	07:45:23
17	context stands for Google Apps which was	07:45:25
18	the name for Google Workspaces before.	07:45:29
19	It's also been called Google Enterprise.	07:45:33
20	I apologize for Google because that suite	07:45:35
21	has changed names quite a bit. There's no	07:45:38
22	relationship between this project and	07:45:41
23	Google Analytics for Firebase.	07:45:42
24	Q. Got it. So the GA here stands	07:45:45
25	for Google Apps you said. And what is	07:45:48

1 Google Apps? 07:45:53

2 A. Google Apps is a former name for 07:45:56

3 Google Workspaces and may have also been 07:46:00

4 called Google Apps for Enterprise at a 07:46:03

5 period of time and this would you include 07:46:07

6 the suite of products, like Gmail, 07:46:08

7 Calendar, Drive, Docs, Sheets, Keep, 07:46:11

8 et cetera. 07:46:14

9 Q. Got it. So this -- this change 07:46:15

10 in obfuscating GAIA IDs and WAA-off logs 07:46:27

11 did not impact Google Analytics; is that 07:46:37

12 correct? 07:46:39

13 A. Correct. This -- this project 07:46:40

14 solely impacts Google Search stack which 07:46:42

15 includes Maps and Assistant. It has 07:46:46

16 nothing to do with Google Analytics for 07:46:49

17 Firebase. 07:46:51

18 Q. What about Google Ads on mobile? 07:46:52

19 A. The -- (cross talk). 07:46:57

20 Q. Sorry. Go ahead. 07:46:58

21 A. Yeah, there's -- there's no 07:47:01

22 implication of this project on display ads 07:47:03

23 either, just Google Search, Maps, 07:47:06

24 Assistant. Those -- those front ends. 07:47:10

25 Q. And, again, there's nothing here 07:47:13